

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA

PLAINTIFFS

v.

CASE NO.: 05-CV-329-TCK-SAJ

TYSON FOODS, INC., et al.

DEFENDANTS

**OBJECTIONS AND RESPONSES OF TYSON FOODS, INC. TO STATE OF
OKLAHOMA'S MAY 30, 2006 SET OF REQUESTS FOR PRODUCTION**

Separate Defendant Tyson Foods, Inc. ("Tyson") submits the following as its objections and responses to the Plaintiff, State of Oklahoma's May 30, 2006 Set of Requests for Production:

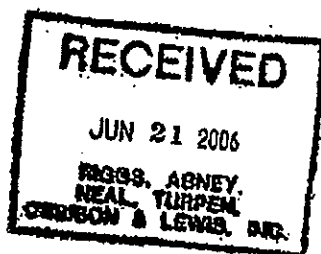
REQUEST FOR PRODUCTION NO. 1: Please produce for inspection and copying copies of all documents and materials made available for inspection and copying by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: Tyson Foods, Inc. objects to Request for Production No. 1 because it is overly broad, unduly burdensome, and seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

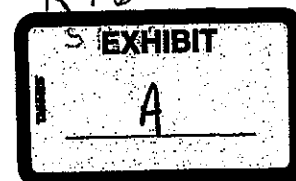
REQUEST FOR PRODUCTION NO. 2: Please produce for inspection and copying copies of all privilege logs produced by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: Tyson Foods, Inc. objects to Request for Production No. 2 because it seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

4850-5795-6097.1



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RTG



REQUEST FOR PRODUCTION NO. 3: Please produce for inspection and copying copies of all written discovery responses made by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3: Tyson Foods, Inc. objects to Request for Production No. 3 because it seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 4: Please produce for inspection and copying copies of all transcripts of persons in your employ and/or under contract with you who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit including all exhibits referenced in the deposition.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4: Tyson Foods, Inc. objects to Request for Production No. 4 because it is overly broad, unduly burdensome, and seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 5: Please produce for inspection and copying copies of all transcripts of depositions of persons retained by you as expert witnesses who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5: Tyson Foods, Inc. objects to Request for Production No. 5 because it is overly broad, unduly burdensome, and seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 6: Please produce for inspection and copying copies of all documents and materials referring, relating or pertaining to the implementation of and compliance with the terms of the consent order entered in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.


RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Tyson Foods, Inc. objects to Request for Production No. 6 because it is vague and ambiguous. It is not clear what document the term "consent order" refers to as numerous orders were entered in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit. Additionally, Tyson Foods, Inc. objects to Request for Production No. 6 because it is overly broad, unduly burdensome, and seeks the production of documents and materials which are irrelevant and not likely to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 7: Please produce for inspection and copying copies of all joint defense agreements to which you are a party that pertain to, in whole or in part, the *State of Oklahoma v. Tyson Foods, Inc.*, 05-CV-329, lawsuit.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: Tyson Foods, Inc. objects to Request for Production No. 7 because it seeks the production of documents that have been prepared in anticipation of litigation and are covered by the attorney-client privilege and/or the joint defense privilege, the attorney work-product doctrine, and the common interest privilege.

Respectfully submitted,

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Mark D. Hopson, appearing *pro hac vice*
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Attorneys for Defendant,
Tyson Foods, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.)
W. A. DREW EDMONDSON, in his capacity as)
ATTORNEY GENERAL OF THE STATE OF)
OKLAHOMA and OKLAHOMA SECRETARY)
OF THE ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the TRUSTEE FOR NATURAL)
RESOURCES FOR THE STATE OF OKLAHOMA,)
Plaintiff,)
vs.) 05-CV-0329 TCK-SAJ
TYSON FOODS, INC., TYSON POULTRY, INC.,)
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,)
AVIAGEN, INC., CAL-MAINE FOODS, INC.,)
CAL-MAINE FARMS, INC., CARGILL, INC.,)
CARGILL TURKEY PRODUCTION, LLC,)
GEORGE'S, INC., GEORGE'S FARMS, INC.,)
PETERSON FARMS, INC., SIMMONS FOODS, INC.,)
and WILLOW BROOK FOODS, INC.,)
Defendants.)
TYSON FOODS, INC., TYSON POULTRY, INC.,)
TYSON CHICKEN, INC., COBB-VANTRESS, INC.,)
GEORGE'S, INC., GEORGE'S FARMS, INC.,)
PETERSON FARMS, INC., SIMMONS FOODS, INC.,)
and WILLOW BROOK FOODS, INC.,)
Third Party Plaintiffs,)
vs.)
City of Tahlequah, *et al.*,)
Third Party Defendants.)

RESPONSES OF DEFENDANT, PETERSON FARMS, INC.
TO STATE OF OKLAHOMA'S MAY 30, 2006 SET OF REQUESTS
FOR PRODUCTION TO POULTRY INTEGRATOR DEFENDANTS



Defendant, Peterson Farms, Inc. ("Peterson Farms"), submits the following Responses to State of Oklahoma's May 30, 2006 Set of Requests for Production to Poultry Integrator Defendants Tyson Foods, Inc., Cobb-Vantress, Inc., Peterson Farms, Inc., Simmons Foods, Inc., Cargill, Inc. and George's, Inc., pursuant to Federal Rules of Civil Procedure 26 and 34.

GENERAL OBJECTIONS:

1. Peterson Farms objects to, and does not agree to subject itself to, the arbitrary and extraordinary "definitions" described by the Plaintiffs to certain terms as set forth in their May 30, 2006 Set of Request for Production propounded to Poultry Integrator Defendants. To the extent that such terms appear in the Request for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, Peterson Farms instead ascribes the ordinary, every day and reasonably, commonly understood meanings which apply to such terms, and also which comply with the Federal Rules of Civil Procedure. Peterson Farms objects to the definitions to the extent they assume facts not in evidence or related to facts or contentions in dispute in the action. Peterson Farms also specifically objects to the definition of "You" as it is overly broad and includes within its scope persons and/or entities distinct from Peterson Farms. Accordingly, Peterson Farms submits these responses on behalf of itself and not for any other person or entity, including any person or entity who raises poultry under contract with Peterson Farms.

2. Each of the following responses is made subject to and without waiving any objections Peterson Farms may have with respect to the subsequent use of these responses or the documents identified pursuant thereto, and Peterson Farms specifically reserves: (a)

all questions as to the privilege, relevancy, materiality, and admissibility of said responses or documents; (b) the right to object to the uses of said responses or the documents identified pursuant thereto in any lawsuit or proceeding on any or all of the foregoing grounds or on any other proper ground; (c) the right to object on any and all proper grounds, at any time, to other discovery procedures involving or related to said responses or documents; and (d) the right, at any time, upon proper showing, to revise, correct or clarify any of the following responses.

3. Peterson Farms objects to each and every request to the extent it seeks or calls for information or the identification of documents which are protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.

4. Peterson Farms objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiffs' First Amended Complaint for which Plaintiffs request relief.

5. Peterson Farms objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and thus, equally available to Plaintiffs.

6. Peterson Farms objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as proprietary and confidential trade secrets.

7. Peterson also incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding requests for production.

8. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Peterson Farms expressly does not waive the application of the remainder of the General Objections to such response. Subject to these objections and subject to any additional objections set forth hereinafter, Peterson Farms responds to Plaintiffs' May 30, 2006 Set of Request for Production to Poultry Integrator Defendants as follows:

REQUEST NO. 1: Please produce for inspection and copying copies of all documents and materials made available for inspection and copying by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Peterson Farms objects to this request as it is overly broad and burdensome. This request seeks the entire production of documents related to another litigated case that involved another distinct watershed, entirely different operations, and which included within its scope Peterson Farms' poultry processing plant, which is not at issue in the present case. Furthermore, Peterson Farms objects to this request as it seeks documents that are neither relevant to Plaintiffs' claims, nor are they likely to lead to the discovery of relevant evidence. Peterson Farms also objects to this request as it seeks documents and information regarding operations which occurred outside of the statute of limitations applicable to Plaintiffs' claims in this case. Finally, Peterson Farms objects to the request as it includes within its scope documents that contain confidential business

information and trade secrets. The request fails to set forth a sufficiently defined scope of discovery or to adequately identify the type or nature of documents sought so as to reach any specific documents, which constitutes a mere fishing expedition. Therefore, it is apparent that this request was not propounded for any legitimate purpose, but was served solely to harass and oppress Peterson Farms.

REQUEST NO. 2: Please produce for inspection and copying copies of all privilege logs produced by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Peterson Farms responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 3: Please produce for inspection and copying copies of all written discovery responses made by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Peterson Farms responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 4: Please produce for inspection and copying copies of all transcripts of depositions of persons in your employ and/or under contract with you who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit including all exhibits referenced in the deposition.

RESPONSE: Peterson Farms responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 5: Please produce for inspection and copying copies of all transcripts of depositions of persons retained by you as expert witnesses who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Peterson Farms responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 6: Please produce for inspection and copying copies of all documents and materials referring, relating or pertaining to the implementation of and compliance with the terms of the consent order entered in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Peterson Farms responds to this request by incorporating herein the objections set forth in response to Request No. 1, above. Furthermore, and without waiving the foregoing objections, Peterson Farms states that documents related to the implementation and compliance with the Court's Settlement Order, to the extent publicly available, can be obtained from the Court's Special Master, John Everett.

REQUEST NO. 7: Please produce for inspection and copying copies of all joint defense agreements to which you are a party that pertain to, in whole or in part, the *State of Oklahoma v. Tyson Foods, Inc.*, 05-CV-329, lawsuit.

RESPONSE: Peterson Farms objects to this request as it seeks documents that are protected from discovery by virtue of the attorney-client, joint defense and co-party privileges, as well as the trial preparation and attorney work product doctrines. Peterson Farms also objects to this request as the documents sought are not relevant to any claim or

defense at issue in the case, and therefore, they are irrelevant and not likely to lead to the discovery of admissible evidence.

Respectfully submitted,

By /s/ A. Scott McDaniel



A. Scott McDaniel (Okla. Bar No. 16460) smcdaniel@jpm-law.com

Chris A. Paul (Okla. Bar No. 14416)

Nicole M. Longwell (Okla. Bar No. 18771)

Philip D. Hixon (Okla. Bar No. 19121)

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(918) 599-0700

**COUNSEL FOR DEFENDANT
PETERSON FARMS, INC.**

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

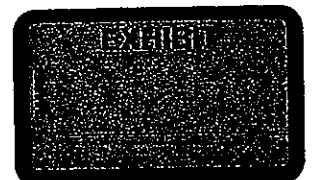
STATE OF OKLAHOMA, et al)	
)	
Plaintiff,)	
)	
vs.)	Case No. 05-CV-0329 TCK-SAJ
)	
TYSON FOODS, INC., et al)	
)	
Defendants.)	

**RESPONSES OF DEFENDANT, GEORGE'S, INC., AND GEORGE'S FARMS, INC., TO
STATE OF OKLAHOMA'S MAY 30, 2006 SET OF REQUESTS FOR PRODUCTION**

COMES NOW Defendant, George's, Inc., and George's Farms, Inc. ("George's"), and for their Responses to State of Oklahoma's May 30, 2006, Set of Requests for Production, state as follows, to-wit:

GENERAL OBJECTIONS:

1. George's objects to and does not agree to subject itself to the arbitrary and extraordinary "definitions" described by the Plaintiffs to certain terms as set forth in their May 30, 2006, Set of Requests for Production. To the extent that such terms appear in the Request for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, George's instead ascribes the ordinary, every day and reasonably, commonly understood meanings which apply to such terms, and also which comply with the Federal Rules of Civil Procedure. George's objects to the definitions to the extent they assume facts not in evidence or related to facts or contentions in dispute in the action. George's also specifically objects to the definition of "You" as it is overly broad and includes within its scope persons and/or



entities distinct from George's. Accordingly, George's submits these responses on behalf of itself and not for any other person or entity, including any person or entity who raises poultry under contract with George's.

2. Each of the following responses is made subject to and without waiving any objections George's may have with respect to the subsequent use of these responses or the documents identified pursuant thereto, and George's specifically reserves: (a) all questions as to the privilege, relevancy, materiality, and admissibility of said responses or documents; (b) the right to object to the uses of said responses or the documents identified pursuant thereto in any lawsuit or proceeding on any or all of the foregoing grounds or on any other proper ground; (c) the right to object on any and all proper grounds, at any time, to other discovery procedures involving or related to said responses or documents; and (d) the right, at any time, upon proper showing, to revise, correct or clarify any of the following responses.

3. George's objects to each and every request to the extent it seeks or calls for information or the identification of documents which are protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.

4. George's objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiffs' First Amended Complaint for which Plaintiffs request relief.

5. George's objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and

thus, equally available to Plaintiffs.

6. George's objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as proprietary and confidential trade secrets.

7. George's also incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding requests for production.

8. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, George's expressly reserves the application of the remainder of the General Objections to such response. Subject to these objections and subject to any additional objections set forth hereinafter, George's responds to Plaintiffs' May 30, 2006 Set of Request for Production:

REQUEST NO. 1: Please produce for inspection and copying copies of all documents and materials made available for inspection and copying by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: George's objects to this request as it is overly broad and unduly burdensome. This request seeks the entire production of documents related to another litigated case that involved another distinct watershed and entirely different operations, which are not at issue in the present case. Furthermore, George's objects to this request as its seeks documents that are neither relevant to Plaintiffs' claims in this case, nor are they likely to lead to the discovery of relevant evidence for this case. George's also objects to this request as its seeks documents and information

regarding operations which occurred outside of the statute of limitations applicable to Plaintiffs' claims in this case. Finally, George's objects to the request as it includes within its scope documents that contain confidential business information and trade secrets that were subject to protective orders in the other lawsuit. It is apparent that this request was served solely to harass and oppress George's.

REQUEST NO. 2: Please produce for inspection and copying copies of all privilege logs produced by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: George's responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 3: Please produce for inspection and copying copies of all written discovery responses made by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: George's responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 4: Please produce for inspection and copying copies of all transcripts of depositions of persons in your employ and/or under contract with you who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit including all exhibits referenced in the deposition.

RESPONSE: George's responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 5: Please produce for inspection and copying copies of all transcripts of depositions of persons retained by you as expert witnesses who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: George's responds to this request by incorporating herein the objections set forth in response to Request No. 1, above.

REQUEST NO. 6: Please produce for inspection and copying copies of all documents and materials referring, relating or pertaining to the implementation of and compliance with the terms of the consent order entered in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: George's responds to this request by incorporating herein the objections set forth in response to Request No. 1, above. Moreover, George's states that documents related to the Court's Settlement Order, to the extent publicly available, can be obtained from the Court's Special Master, John Everett.

REQUEST NO. 7: Please produce for inspection and copying copies of all joint defense agreements to which you are a party that pertain to, in whole or in part, the *State of Oklahoma v. Tyson Foods, Inc.*, 05-CV-329, lawsuit.

RESPONSE: George's objects to this request as it seeks documents which are protected from discovery by virtue of the attorney-client, joint defense and co-party privileges, as well as the trial preparation and attorney work product doctrines. George's also objects to this request as the documents sought are not relevant to any claim or defense at issue in this case, and, therefore, they are irrelevant and not likely to lead to the discovery of admissible evidence.

**GEORGE'S, INC., and
GEORGE'S FARMS, INC.**

By: 

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-AND-

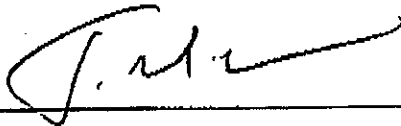
Randall Rose (OB #7753)
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Attorneys for Separate Defendants

Certificate of Service

This is to certify that I have this day served counsel for all parties in the foregoing matter with this pleading by depositing in the United States mail a copy properly addressed with adequate postage thereon.

This 30th day of June, 2006.



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
)	
Plaintiffs)	
)	
v.)	Case No. 4:05-cv-00329-TCK-SAJ
)	
TYSON FOODS, INC., et al.)	
)	
Defendants)	

SIMMONS FOODS, INC.'S
RESPONSES TO PLAINTIFFS' MAY 30, 2006 SET OF
REQUEST FOR PRODUCTION OF DOCUMENTS

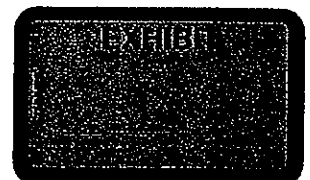
Comes now the Separate Defendant, Simmons Foods, Inc. ("Simmons"), and for its Responses to Plaintiffs' May 30, 2006 Set of Request for Production of Documents, states and alleges as follows:

GENERAL OBJECTIONS

1. Simmons objects to Plaintiffs "Instructions and Definitions" to the extent they seek to include "agents" and "Contract Growers" in the definition of Simmons and the definition of "you" and "yours". Simmons further objects to and does not agree that it has any obligation or the ability to produce documents from any person or entity other than Simmons.

REQUEST FOR PRODUCTION NO. 1: Please produce for inspection and copying copies of all documents and materials made available for inspection and copying by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: Simmons objects to this Request on the grounds that it is overly broad and unduly burdensome and is not reasonably calculated to lead to the discovery of



admissible evidence because it seeks documents concerning third party operations outside the Illinois River Watershed, seeks documents concerning Simmons' operations outside the Illinois River Watershed, and seeks documents prior to 2002, which is beyond the earliest time period allowed by statutes of limitations applicable to Plaintiff's claims. Simmons further objects to this Request on the grounds that it seeks confidential and proprietary trade secret or business documents subject to a Protective Order dated March 29, 2002. Simmons further objects to this Request because it seeks documents exchanged in conjunction with the Court-Ordered Settlement Conferences and is protected by Fed. R. Evid. 408 and the Court's Settlement Order dated May 21, 2002, and subsequent Settlement Conference Orders.

REQUEST FOR PRODUCTION NO. 2: Please produce for inspection and copying copies of all privilege logs produced by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: See Response to Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 3: Please produce for inspection and copying copies of all written discovery responses made by you to the plaintiffs in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: See Response to Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 4: Please produce for inspection and copying copies of all transcripts of depositions of persons in your employ and/or under contract with you who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit including all exhibits referenced in the deposition.

RESPONSE: See Response to Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 5: Please produce for inspection and copying copies of all transcripts of persons retained by you as expert witnesses who were deposed in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: See Response to Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 6: Please produce for inspection and copying copies of all documents and materials referring, relating or pertaining to the implementation of and compliance with the terms of the consent order entered in the *City of Tulsa v. Tyson Foods, Inc.*, 01-CV-0900, lawsuit.

RESPONSE: See Response to Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 7: Please produce for inspection and copying copies of all joint defense agreements to which you are a party that pertain to, in whole or in part, the *State of Oklahoma v. Tyson Foods, Inc.*, 05-CV-329 lawsuit.

RESPONSE: See Response to Request for Production No. 1.

SIMMONS FOODS, INC.,

Defendant

By: 

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